

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT**EQUITY SIDE.

STATE OF ALABAMA,
BALDWIN COUNTY.

TO THE HONORABLE A. E. GAMBLE, JUDGE OF THE CIRCUIT COURT.
BALDWIN COUNTY, ALABAMA,---IN EQUITY.

Your Orator, Will Baker, respectfully represents and shows unto your Honor as follows:

FIRST.

That he is a bona fide resident citizen of the County of Baldwin, State of Alabama, and have been a resident for a period of more than three years next immediately preceeding the filing of this bill and that he resides at Tensaw, Alabama. That he is over the age of twenty-one.

That Pender Baker is over the age of twenty-one years and is a resident of the State of Alabama, residing at Tensaw, Alabama.

SECOND.

That your Orator and the said Pender Baker were married during the month of June, 1916, and lived together as man and wife until about one year ago when your Orator was called in the service of his country where he remained until about one month ago, at which time your Orator returned and found that his wife the said Pender Baker had been untrue to him and had committed adultery with one Will Porter.

PRAYER FOR PROGRESS.

The premises considered, your Orator respectfully prays that the said Pender Baker be made party respondent to this bill of complaint by the usual process of this Honorable Court and that she be required to demur, plead to or answer the same within the time and under the pains and penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause your Honor will grant unto your Orator an absolute divorce from the said Pender Baker, and that he may be allowed to again contract marriage; that your Honor will grant him such other and further relief as ~~he~~ may be in equity and justice be entitled-she will ever pray etc., etc.,

PAGE & MOORE,
Attorneys for Complainant.

FOOT NOTE:

The Defendant, Pender Baker, is required to answer each and every paragraph of the above bill of Complaint from "FIRST" to "SECOND", both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORE,
Solicitors for complainant.